

In my opinion, the changes to Fcc Part 15 rules that SAVI Technology is asking for are quite extreme. If they need changes like that to be able to operate their devices legally, then it would seem that these devices would be better off in a different, licensed, classification. The frequency that these devices operate on is in a part of the 70 cm band where amateur radio enthusiasts operate what are known as weak signal stations. We use sensitive receivers and high gain antennas to communicate over longer distances. The changes that are proposed SAVI Technology would cause considerable interference to these stations, especially if these RFID devices become as popular as SAVI Technology claims they will.

Speaking as a person who works in manufacturing, there are flaws with some of the claims in the petition. An attempt to run a factory in the manner that SAVI Technology suggests would almost certainly be met with disaster. Also the changes needed in the factory itself to permit such operation would be extensive and costly. Very few if any manufacturers would adapt an existing plant to use the technology in the way that is suggested in the petition.

I hope that the FCC sees that what would be needed would be a reclassification of the RFID devices made by SAVI Technology to perhaps a part 18 ISM device. Thank you.